

## Pembrokeshire County Council LDP Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response

-(We note that a SELF-ASSESSMENT based on the soundness tests has been PROVIDED at Preferred Strategy stage (at Appendix 6 of the preferred Strategy doc; LDP Manual 6.5.1)

### P1 - Prepared in accordance with the Delivery Agreement including the CIS

| <u>Comments</u>   | <u>Suggested Actions</u> |
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| We assume that the Preferred Strategy has been prepared in accordance with the Delivery Agreement. Please advise if this is not the case – the self-assessment doesn't indicate any discrepancies (App6). | N/A                      |

### P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment (and Habitats Directive Appropriate Assessment)

| <u>Comments</u>  | <u>Suggested Actions</u>  |
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| <p><b>SA/SEA:</b> We note that:</p> <ul style="list-style-type: none"> <li>- the Preferred Strategy has been subject to SA/SEA: chapter 10 of the Preferred Strategy provides the non-technical summary of the Initial SA Report; supporting documentation (prepared by PCC) is the <i>Initial Sustainability Appraisal Report</i> (March'09), (+<i>SA Scoping Report July08; Final SA Scoping Report Jan'09</i>). The Initial SA Report is subject of current consultation.</li> </ul> <p><b>Habitats Appropriate Assessment (HRA):</b> We note that:</p> <ul style="list-style-type: none"> <li>- the Preferred Strategy (para 10.30) advises that there are a number of Natura 2000 sites designated for their habitats and species which will need to be considered; that HRA is being carried out throughout the production of the plan, and reported separately but parallel to this SA process; that the Preferred Strategy will be screened against the conservation objectives for the Natura 2000 sites and consulted on with the statutory consultees.</li> </ul> | It is vital that PCC is able to demonstrate that it has followed the correct procedure outlined in the SEA Regulations, the Habitats Regulations and has had regard to the European Protected Species and that the deposit plan has had regard to the findings. |

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### C1 It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.

| <u>Comments</u>   | <u>Suggested Actions</u>   |
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| <p>We note that chapter 4 of the preferred strategy aims to provide the national, regional and local context for the LDP and refers to a number of the key <b>relevant plans, policies and strategies</b>:</p> <p><b>National:</b> WSP People, Places, Futures'04 &amp; '08Update (Pembs Haven), PPW, MPPW, MIPPS, Circulars, TANs.</p> <p><b>Regional:</b> SW Wales Regional Transport Plan '08draft; Minerals Rgnl Technical Statement '07draft; SWW Regional Waste Plan '03&amp; 1stReview'07draft; Rural Development Plan for Wales'07-'13;</p> <p><b>Local:</b> Pembs Advance-Rural Development Plan '07-'13; Pembs Community Plan '03-'08 (full review anticipated 2009); PCC Local Housing Strategy '07-'10; PCC Tourism Strategy '06-'12; Local Biodiversity Action Plan 2000; PCNP Management Plan '08-'12draft; neighbouring emerging LDPs – PCNPA, Ceredigion, Carm; cross boundary work.</p> <p>PCC &amp; PCNPA Joint Statement of Strategic Principles August 2008</p> <p>The SA Scoping Report (Final Report Jan'09) contains a comprehensive list &amp; fuller analysis of Relevant Policies, Plans &amp; Programmes (at its Appendix 1)</p> <p><b>Relationships:</b></p> <p>Chapter 3 on 'Pembrokeshire in Context' gives little indication of the place of Pembrokeshire within the wider region and of the general relationship with various plans and policies of neighbouring local authorities.</p> <p>The relationship between the plan area and the National Park area is referred to (para 3.3, 3.4, 4.29, 4.30 &amp; 4.33; + at self-assessment test C1) but there is no real feel for the critical inter-relationship between the plan areas and implications of emerging strategies, and the preferred strategy doesn't provide adequate clarification.</p> <p>Note that you state at para 4.30: <i>It is therefore important to ensure the County Council and National Park Authorities LDP's are compatible with each other. To ensure that close working occurs between the two authorities, a Joint Statement of Strategic Principles has been prepared which identifies principles for areas of Joint Working.</i></p> <p>Also note that the PCC/PCNPA meetings listed at Section F of the <i>Report on Public Consultation throughout the LDP Process Jan'09</i></p> | <p>Ensure that contextual strategies have collectively influenced the strategy, and that it made clear how they have done so. This includes emerging strategies of key neighbouring LPAs.</p> <p>Coordinate cross border designations and approaches.</p> <p>Ensure evidence is provided on the areas of joint / collaborative working identified both within the authority and external organisations, in particular with Pembrokeshire NPA.</p> <p>Given the geographical and functional relationships between Pembrokeshire and the National Park, it is important to continue to build on the <i>Joint Statement of strategic principles intended to guide preparation of the two LDPs</i> which was agreed by both LPAs in August 2008. It is critical that the strategies of these two emerging LDPs are complementary, are based on an understanding of inter-relationships, that there is agreement on key evidence base (which should be in accordance with national policy) and that policy anomalies are avoided. These matters continue to be raised with both local planning authorities.</p> |

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| <b>C2 It has regard to national policy.</b>  |  |
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| <b>Comments</b>  | <b>Suggested Actions</b>   |
| <p>LDP Wales (and the PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area. The draft strategic policies in the preferred strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1).</p> <p><i>N.B. Comments in relation to national policy are included under soundness tests CE1 &amp; CE2</i></p>   | <p>Review, refine or supplement the strategy and deposit plan proposals to reflect national policy where appropriate. The deposit plan should have a clear statement on the application of national policy; it should also incorporate a form of notation that makes clear when national policy will apply.</p> <p><i>See comments under soundness tests CE1 &amp; CE2</i></p> |
| <b>C3 It has regard to the Wales Spatial Plan</b>  |  |
| <b>Comments</b>  | <b>Suggested Actions</b>   |
| <p>The soundness self-assessment refers (appendix 6).<br/>Paras 4.5-4.6 repeats the text from the Wales Spatial Plan Update 2008 in specifically referring to the framework setting role of the WSP ('08 update) &amp; the Pembs Haven Area.<br/>The vision statement (para 6.4) has been influenced by the vision for the Pembrokeshire Haven plan area. The preferred spatial option (<i>para 8.12 etc</i>) says that it adopts the concept of haven towns and hubs as specified in the WSP for the Pembrokeshire Haven Area.</p> <p>However, the fit with the Spatial Plan is not sufficiently clear:</p> <ul style="list-style-type: none"> <li>- The preferred spatial option has a 50% Urban(i.e. hubs) / 50% Rural split for new development and it is not clear how this split would distribute growth across the area in a manner that would serve to strengthen the strategic hubs as the WSP suggests future development should do. There is a lack of clarification and evidence as to why this split is appropriate – para 8.11 refers to a majority stakeholder view but fails to clarify why this is</li> </ul> | <p>If the chosen spatial option is to be progressed, it is necessary to more clearly clarify and justify the strategy in the light of the priorities outlined within the Wales Spatial Plan Update 2008.</p> <p>Clarify further the interface / collaboration with neighbouring LPAs,</p>  |

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| <p>appropriate. It is not clear from the strategy and its Key Diagram as to how the hub concept and clustering approach follows through to the spatial distribution of development in the rural areas. Although the Initial SA Report Non-Technical Summary does refer to development in rural areas being between clusters of villages between which a minimum level of access to service provision is available (at para 10.23 of Preferred Strategy doc), this is not made clear in the Preferred Strategy in relation to the primary and secondary service villages and any basis upon complementarity rather than on individual assessments. (The settlement study work that WAG and PCC have jointly commissioned should assist - due to report in May09.)<br/> <b>+ see at Soundness Tests CE1/2</b></p> <p>- Although specific figures have not been provided, it appears that Narbeth is being promoted for substantial growth which is not in line with the WSP Update 2008. Narbeth has a current population of some 1900 people, is defined as a 'medium-sized settlement' in the WSP Update and is not in either the Haven Towns or the Fishguard &amp; Goodwick hubs. The preferred strategy says that Narbeth, "<i>.. is likely to receive a larger share of growth than any other settlement in the rural area</i>" (para 8.16).</p> <p><b>See also further comments under Soundness Tests CE1 and CE2.</b></p> | <p>especially the National Park.</p> <p>Ensure that there is clear evidence supporting Narbeth's status in plan's <b>strategy</b>.</p> |
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| <b>C4 - Has regard to the relevant community strategy/ies.</b>   |                          |
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| <b>Comments</b>  | <b>Suggested Actions</b> |
| <p>Appears to do so; paras 4.20ff &amp; 6.9 identifies the community plan, and the soundness self-assessment (at appendix 6) says that the Preferred Strategy has been prepared in the context of the Community Plan; chapter 6 and the self-assessment clarify that the CP has informed the vision statement and objectives of the LDP.</p> | <p>To note.</p>          |

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**CE1 The plan sets out coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities**

**&**

**CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives, and/or are founded on a robust and credible evidence base**

| <b>Comments</b>   | <b>Suggested Actions</b>  |
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| <p>The Preferred Strategy documentation should make clear what the <b>key issues</b> are that the LDP will address, what the plan <b>vision</b> is, what the plan <b>objectives</b> are, what <b>strategic spatial options</b> were considered and what the <b>preferred spatial strategy</b> is (see LDP Manual section 6.5). These are identified in the Preferred Strategy document at chapters 6 to 8.</p>  |   |
| <p>37 <b>key issues</b> are identified (paras 6.19ff). Following a review of environmental, social and economic conditions at chapter5, Chapter 6 then uses the framework of the 5 key priorities from the Community Plan to identify the <b>key issues</b> for the LDP and the subsequent LDP objectives. Para 6.18 refers also to the role of the SEA Scoping report evidence. The Issues Paper Oct08 (<i>Key issues for the LDP Identified under Community Plan Priorities</i>) gives 25 issues; the <i>Summary of Issues from Public Consultation Events Oct08</i> which includes early stakeholder meetings concludes with 5 most commonly mentioned issues at para 1.7. A focussed small number of key critical land-use issues for the plan area is preferable and would ensure that the strategy is suitably focussed to deliver on them.</p> | <p><b>Issues</b> – clarify which are the small number of key critical land-use issues and ensure that the strategy is suitable focussed to deliver on them.</p> |
| <p>The LDP <b>vision</b> (para 6.15) incorporates the visions for the Community Plan and the Pembrokeshire Haven area of Wales Spatial Plan Update 2008. Whilst it is locally specific in terms of future land uses, it would benefit from more locally distinct content with a spatial dimension. It should provide a clear picture of where the authority wants to be in land-use terms by the end of the plan period, e.g. how the area will look and function, how it will have changed over the plan period and where the majority of development will have taken place.</p>   | <p><b>Vision</b> – amend / enhance the LDP vision to make it more locally distinct and indicative of the desired position in 2021.</p>                          |

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| <p>21 LDP <b>objectives</b> are identified (paras 6.19ff &amp; page 38) with clear links to the identified issues; whilst they cover the many issues identified in chapter 6, they are fairly generic and could be applicable to almost anywhere. They are distinct from the SA objectives (Initial SA Report pages 22-25). Improvement would be to have SMART objectives which include details of the actions that need to be taken to achieve the vision (and timescales if appropriate) and which would make them easier to monitor and ensure the strategy is being delivered.</p>  | <p>Consider developing into SMART <b>objectives</b> to aid clarity for monitoring; ensure that any links / inconsistencies / conflicts between objectives are identified and also identify any prioritisation that is required.</p>   |
| <p><b>Preferred strategy from strategic options:</b> Background Papers on the web-site on how the vision, objectives and options were developed include <i>LDP Vision, Objectives and Options Nov08, SA of Strategic Policies and Spatial Options Nov08</i>, report of <i>Stakeholder Consultation workshop 8Dec08</i>. It would appear that <b>3 potential growth options</b> and <b>3 potential spatial options</b> were generated in-house (paras 7.5, 7.13); these were then the subject of stakeholder engagement. The Preferred Strategy is a hybrid of elements of spatial options 2 and 3 (para 7.19, 7.20). Paras 7.18 and 8.11 indicates the chosen hybrid option was the “majority view” amongst stakeholders whilst the Soundness Self Assessment (Appendix 6 - page 100) implies the preferred option was chosen by the stakeholders. Whilst stakeholders should be engaged in developing the strategy, it is important that the resultant strategy is founded firmly on robust evidence.</p> <p><b>The Preferred Growth Option</b> (paras 7.11, 8.5) is Medium to High Growth of 600 units per annum which exceeds historic average build rates over a 10 year period of 470 per annum. This high growth is viewed as being desirable in order to address economic aspirations and help reduce the affordable housing backlog. However, the Preferred Strategy appears to establish a growth option without taking critical information on housing requirements and needs (from the LHMA) into account – <i>see comments below under ‘Housing’</i>.</p> <p><b>The Preferred Spatial Option</b> (para 8.12) is a 50% urban and 50% rural split based upon a defined settlement hierarchy (para 8.13). The Initial SA Report Summary states that the <i>‘development in rural areas would be distributed between clusters of villages between which a minimum level of access to service provision is available’</i> (para 10.23). However, the Preferred Strategy (ch 8) makes no mention of such clustering and states housing growth in rural areas will be apportioned on the basis of a hierarchy derived from the Wales Spatial Plan and the Council’s rural facilities study. (Footnote 15 on page 55 appears to explain that a form of clustering may be explored for settlements which individually have too few services to be identified in the hierarchy).<br/><b>+ see comments above at C3 re regard to WSP</b> – regarding how the 50/50 split would distribute growth across the area in a manner that would serve to strengthen the strategic hubs as the WSP suggests future development should do.</p> <p>The meaning of the phrase <b>‘areas of change’</b> in relation to the hub towns requires clarification (e.g. para 8.15).</p> | <p>Ensure that the Deposit Plan incorporates a <b>strategy</b> that is clearly and firmly founded on robust evidence, and that the role of stakeholders in developing it is appropriate; and that it is clear in how it will achieve the plans objectives.</p> <p>Ensure growth strategy is suitably robust</p> <p>Ensure that the spatial strategy is suitably supported by the SA</p> <p>This phrase needs to be clarified in the</p> |

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| <p><b>The Proposed Settlement Hierarchy</b> identifies Primary and Secondary Service Villages based upon the Council's appraisal process in the Rural Facilities Survey. Whilst a Post Office/Local Store/Primary School are given two points each in the appraisal compared to some other "Additional services" which receive one point, these facilities are not seen as being of key importance. Without a shop or post office it is questionable whether a settlement can be viewed as a sustainable location as day to day needs will not be provided for. Fourteen of the Secondary Service Villages do not have a Post Office, Local Store or Primary School. Perhaps the Primary and Secondary Villages should be combined and/or the latter reduced to exclude those settlements which do not provide for day to day needs.</p> <p>It is not entirely clear how <b>the spatial strategy</b> achieves the <b>plan's objectives</b>.</p> <p>It is not clear if there are any <b>strategic sites</b> proposed within the plan area.</p>  | <p>deposit plan.</p> <p>Reconsider appropriateness of primary and secondary service village categories within the settlement hierarchy</p> <p>Ensure that the deposit plan clearly identifies any <b>strategic sites</b>.</p>   |
| <p><b>Evidence – robust and credible:</b><br/><b>Background Studies / Evidence Base</b> are referenced –<br/>Retail - Main Towns July08; Pembrokeshire Economic Profile July08; Population, Household and Labour Force Projections Sep08; Employment Sites Report Comparison of 2000, 2003, 2005 &amp; 2007 Survey Data, Oct08; Rural Facilities Survey Report 07-08 Dec08;<br/>LANDMAP Summary Report - LDP Evidence Base, Jan09;</p> <p>SME Survey 2006 - Final Report (Comparative Analysis) 2006; Local Housing Market Assessment 2007 (Draft) 2007; Joint Housing Land Availability Study March 2008; Rural Development Plan 2007 - 2013 Final Submission March 2007; Regeneration Masterplan 2008/2013 The Framework June 2008<br/>(+ emerging "Pembrokeshire Haven Spatial Plan Area Complementarity Study" para 8.25)</p> <p>Initial Sustainability Appraisal Report March09</p> <p>Supporting information: Summary of Issues from Public Consultation Events, Oct08; Issues Papers: Key Issues for the LDP Identified under Community Plan Priorities, Oct08; Report on Public Consultation throughout the Local Development Plan Process, Jan09;</p> <p>We note that a number of studies in the evidence base are not yet completed or have not been made available with the PS documentation. We would draw attention in particular to being clear about:<br/>- any regional apportionment of housing</p> | <p>Ensure appropriate robust and credible evidence is available and its influence in developing and supporting the strategy is clear in the Deposit plan, including if studies arrive at differing conclusions from those that have formed the basis for the draft preferred strategy.</p> <p>It is important that there are suitable clearly referenced background papers to accompany the Deposit plan.</p> |

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| <ul style="list-style-type: none"> <li>- how the LHMA has influenced the level of growth and supports the strategy</li> <li>- that the viability and delivery of affordable housing provision is demonstrated</li> <li>- that other obligation/S106 requirements can be delivered</li> <li>- that the priority to be placed on S106 requirements in particular locations/circumstances is clear</li> <li>- that the issue of infrastructure constraints and required solutions is fully detailed.</li> </ul>   |  |
| <p>The key <b>strategic policies</b> (chapter 9) at present are very general and many lack specific detail for the plan area. Table 1 on page 61 gives the links between the LDP objectives and the strategic</p>  | <p>Ensure the <b>strategic policies</b> in the deposit plan are well aligned to the objectives and chosen strategy with supporting justification to indicate <b>delivery mechanisms and timescales for implementation</b>; the package of policies in the deposit plan should provide greater detail.</p>  |
| <p><b>Implementation and Delivery</b><br/>The <b>deliverability</b> of the preferred option has not really been addressed in the Preferred Strategy document other than reference to a broad phasing policy given the current economic downturn (para 8.6, 8.7 ). When developing the deposit plan more consideration should be given to this matter, including <b>timescales</b> for implementation, and impacts on the delivery of affordable housing should be fully explored. There is an indication that sewerage infrastructure (para 5.16 + issue 6) and other constraints are significant issues but it is not entirely clear that these have yet been fully explored; these may prejudice the delivery of the spatial growth strategy in certain areas and affect the soundness of the plan.</p> <p><b>Flexibility</b><br/>Some reference is provided concerning flexibility in the housing land requirements as a response to the current economic climate (see at phasing comment). The deposit LDP should be sufficiently <b>flexible</b> to enable it to deal with changing circumstances (such as a key site not coming forward for development), and identify any contingencies that might be in place, or what would trigger a review of the Plan.</p> | <p>Ensure that the key elements of the strategy can be delivered, and that proposed timescales this delivery are provided.<br/>Funding streams, key delivery agents, and infrastructure requirements will need to be identified at an early stage.</p> <p>Ensure the strategy and deposit plan is sufficiently flexible to respond to changes in the economy, housing market assessment, key site take up and other changes.</p> |
| <p>A <b>monitoring framework</b> is at chapter 11 which sets out targets and indicators as a basis for assessing the effectiveness of the strategic policies. Whilst this does include some useful targets and indicators, it needs to be developed further for the deposit plan to provide a better monitoring and implementation framework as this is critical in showing how the strategy will be delivered. A developed framework should consider plan objectives,</p>   | <p>Ensure the <b>monitoring and implementation framework</b> will be satisfactory for measuring the</p>  |



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| <p>strategic and relevant non-strategic policies together with principal implementation routes, responsibility for implementation (including stakeholder involvement), timescale, resource implications, targets, phasing and indicators. Contingencies and triggers for review should also be considered. Ensure that WAG core indicators are included. <i>(Also see comments deliverability and flexibility; and at Test CE3 below)</i></p>  | <p>effectiveness of the plan strategy and policies, and that WAG core indicators are included.</p>   |
| <p>Clarification of how the site assessment process (through the <b>candidate site methodology</b>) will work is provided (appendix 2); the methodology indicates a 3-stage assessment of all 1079 candidate sites which were submitted between November and May '08, and includes sifting out of unsuitable sites, and SA/SEA of sites remaining at final stage.</p>  | <p>----</p>  |
| <p><b>SPG</b> - Reference is made (para 12.3) to intended preparation of <b>SPG</b> (affordable housing, design, planning obligations and recreational open space) with further information on the SPG programme to be provided in the Deposit plan.</p>   | <p>----</p>  |
| <p><b>Housing</b></p> <p><b>Housing / affordable housing requirement</b> - The Preferred Strategy requires 4,700 new dwellings to be built over the plan period, covering both market and affordable homes (with land reserved for a further 1,300 dwellings to be released after 2016 if monitoring indicates that this is appropriate). The housing requirement of 4,700 dwellings appears to be simply based on past building rates and does not appear to take account of either a <b>regional apportionment exercise</b> or the results of a <b>Local Housing Market Assessment (LHMA)</b>. In addition, although Pembrokeshire has produced its own household projections, the Assembly Government will shortly be publishing its 2006-based household projections by local authority area (with data for National Parks identified separately) and the County Council will therefore need to review this issue at this time (<i>LDP- Population, Household and Labour Force Projections, Sep2008</i>).</p> <p>An <b>affordable housing target</b> has not been established as required by MIPPS 01/2006. Increased provision of affordable housing is a key policy goal for the Assembly Government (as expressed in section 5.1 of 'One Wales – a progressive agenda for the government of Wales' June 2007). The Preferred Strategy aims "to identify sufficient land to meet the <b>housing needs</b> arising within the County Council's planning area." It is unclear whether this aim would cover meeting the backlog of unmet need. The Preferred Strategy states (in Chapter 11, Monitoring) that the affordable housing target will not be established until the authority's LHMA has been updated and Policy 4 states that, when set, this will address new affordable housing needs and will only address the backlog "where possible". However, the Preferred Strategy also states that the need to tackle the backlog of affordable housing need was identified as a factor in arriving at the preferred</p> | <p>The deposit LDP should:</p> <ul style="list-style-type: none"> <li>- provide robust housing figures which are adequately evidenced in accordance with national policy;</li> <li>- include a robust affordable housing target;</li> <li>- provide threshold(s) to deliver affordable housing and clarify the reasons for them with suitable viability studies;</li> <li>- clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas.</li> </ul> |

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growth option (para. 7.10). These apparent discrepancies need to be rectified and there needs to be a clear policy to address both existing and future housing need, as identified by the LHMA.

**Housing requirement & implications for the strategy** - The Preferred Strategy therefore appears to establish a growth option without taking critical information on housing requirements and needs (from the LHMA) into account; whereas other growth options might result in a higher housing figure which would provide greater scope for the delivery of affordable housing in order to address the lack of affordable housing and problems of affordability identified in paragraph 5.6.

Housing growth is to be split 50% in towns and 50% in rural settlements, to be apportioned on the basis of the **settlement hierarchy** (derived from the Council's rural facilities study) which ranges from 'Hub' towns to 'Secondary Service Villages' and 'all other settlements and developments in countryside locations'. In addition, the Sustainability Appraisal Summary states that development in rural areas would be 'between clusters of villages between which a minimum level of access to service provision is available' (para 10.23). It is unclear how the approach set out in the Initial SA Report Summary relates to the settlement hierarchy. Also, given this approach and the size of some of the settlements (particularly in the 'Secondary Service Villages' category), it is unclear how development in the rural settlements will be managed.

The **phasing** proposal related to the Preferred Growth Option and based upon **strategic policies 1 and 2** proposes 4,700 dwellings over the Plan period 2011-21, 'Reserve Housing Land' for 1,300 dwellings to be released after 2016 if monitoring shows that the 4,700 dwelling target will be met before the end of the Plan period. This phasing policy is intended to ensure that development is spread throughout the Plan period and avoids the cherry-picking of easy to develop sites. Whilst this could be argued to provide flexibility, it is questionable whether it provides developers and infrastructure providers with sufficient certainty to make future investment decisions.

### **Gypsies & Travellers** (Issue 7 & Policy 5)

Consideration and provision is required in accordance with WAG Circular 30/20007 and MIPPS 01/2006; including being based upon an Accommodation Needs Assessment of Gypsies Travellers (sections 225 and 226 of the Housing Act 2004).

The results of the biannual Gypsy / Traveller Caravan count appears to be at variance with the conclusion of the draft Pembrokeshire LHMA (insofar as it covers Gypsy and Travellers ).

Consider whether a review of the growth options is required, alongside a review of the sites in the land supply.

Ensure that the evidence base relating to the settlement hierarchy is sufficiently robust.

Ensure appropriate site(s) are identified in the deposit plan (both permanent and transit) along with an appropriate criteria based policy.

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| <p><b>Employment</b> (paras 8.8, 8.22 &amp; policy 6)</p>   | <p>The deposit plan and its evidence base should:</p> <ul style="list-style-type: none"> <li>- clarify relationships with neighbour authority employment strategies / allocations;</li> <li>- identify any strategic employment sites;</li> <li>- be robust and realistic in terms of employment land allocations and their deliverability;</li> <li>- clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas.</li> </ul> |
| <p><b>Landscape and biodiversity</b></p> <p>The LDP should be more consistent with the Biodiversity Duty placed on all public bodies by the Natural Environment and Rural Communities Act 2006. Increasing biodiversity and improving habitat management is recognised within the LDP as an issue of significance. Loss of and threats to certain species and habitats is an acknowledged issue within the LDP. An <b>objective</b> of the LDP is to protect and enhance the natural environment. However <b>Policy 12</b> is less proactive and more imprecise in that it states that the natural environment will be protected from inappropriate development and where possible enhanced.</p> <p><b>Strategic Policy 12</b> (Environment) in its present form does not seem to add to national policy. It should aim to enlarge upon the plan's objectives in a locally specific manner, based on the key local environmental issues highlighted by the evidence base. Policy 12 needs to be stronger in terms of definitely including positive action to increase biodiversity and less vague in what is intended by "inappropriate". Implementation will be the key factor determining how well the LDP achieves its aims regarding biodiversity and a biodiversity SPG may be appropriate.</p> <p>It would be useful to consider the hierarchy of green infrastructure, including landscape and biodiversity networks, corridors, and linear and stepping stone features (not just statutorily designated sites). The local implications of any information on sites and networks need to be considered and highlighted, particularly where there are strategic spatial implications for the plan, and links between the evidence and the preferred strategy (and the emerging deposit plan) should be clearly shown.</p> | <p>To note and consider.</p>  |

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| <p>Reflection on the landscape and biodiversity links with the National Park should be included and it may be of value to have a policy in the deposit plan that addresses the spatial element of landscape protection and enhancement, to ensure physical linkages within and between Pembrokeshire and adjacent LPAs, particularly the National Park. Landscape policies might be of particular importance when linked to tourism.</p> <p>It would be useful to draw out the spatial implications of the LANDMAP summary report background paper in developing landscape-related policies in the deposit plan, and in the assessment of candidate sites. Introduction of any landscape designations in the deposit plan will need to be suitably evidenced.</p>  |  |
| <p><b>Historic Environment</b><br/>Cadw consider that the following amendments should be made:<br/>Objective Q (pages 37 &amp; 38) - The wording should echo that used in objective P: "To <u>protect and</u> enhance the historic and built environment".<br/>Policy 12 Environment (page 59) - The wording should be consistent with objective Q and therefore should read "The county's natural and <u>historic</u> environment and landscape will be protected from inappropriate development and where possible enhanced."</p>  | To amend for deposit plan.   |
| <p><b>Minerals</b> (policy 13)<br/>The Deposit Plan should have regard to the evidence outlined in the RTS for South Wales and ensure a landbank for aggregates is maintained; safeguarding existing and potential wharves, and sand and gravel reserves; the reworking of slate waste; and that the Council will contribute to the regional demand for a continuous supply of minerals and present evidence of joint-working.</p> <p>Mineral safeguarding (including coal) and mineral allocations for working will need to be shown on the proposals map. The plan needs to be clear as to areas where coal should not be worked. Buffer Zone policy must be included.</p> <p>There is no minerals evidence presented at this stage, e.g. evidence of landbanks including dormant sites/permissions and landbank figures, possible prohibition orders, current operations/production levels and expected future contribution (outlined in the RTS), mineral resources potential for secondary or recycled aggregates, inactive sites, proposals for restoration, and the mineral reserves that should be safeguarded. This needs to be evidenced at the deposit stage, including providing location of existing hard rock and sand and gravel reserves and detailing the amount of existing reserves available in order to support a landbank supply of aggregates (for example by reference to a background paper).</p> | <p>The deposit plan must:</p> <ul style="list-style-type: none"> <li>- be supported by background evidence;</li> <li>- adequately safeguard mineral resources in line with national policy and consistently across boundaries with neighbouring LPAs;</li> <li>- adequately provide for the contribution to aggregates production over the plan period identified in the RTS;</li> <li>- include Buffer Zone and dormant site requirements;</li> <li>- clarification on serving prohibition</li> </ul> |

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|  | orders would be of assistance.  |
| <p><b>Waste</b> (policy 13)</p> <p>At the deposit stage, LDPs should identify sites for local and regional waste facilities or areas where such facilities may be suitable. Regard should be had to the Regional Waste Plan (para 16.2 and Appendix L), in that the requirement for LDPs is to contribute towards reducing the region's waste arising through the identification of appropriate locations for waste management facilities. Policies proposing any major new development should incorporate adequate and effective waste management facilities.</p> <p>As set out in PPW, para. 12.5.4, each LPA should consider what facilities are required to manage all waste streams generated within its area. Evidence should be presented of what waste streams, and hectareage of land, are required. There should also be evidence of joint-working with neighbouring LPAs. There should be regard to the EU Directive Framework for Waste to make provision for establishing an integrated and adequate network of waste disposal installations. Employment sites should be considered and an assessment of each showing its suitability.</p> <p>Evidence should be presented at the deposit stage of:</p> <ul style="list-style-type: none"> <li>- why the sites have been chosen for the location of suitable waste facilities; and</li> <li>- the capacity of the sites to meet regional and local needs.</li> </ul> <p>Sites allocated for waste management in the LDP should be identified on the proposal map.</p> | <p>The deposit plan must:</p> <ul style="list-style-type: none"> <li>- be supported by background evidence;</li> <li>- identify sites for local and regional waste facilities.</li> </ul> |
| <p><b>Renewable Energy</b></p> <p>National policy as contained in the Ministerial Interim Planning Policy Statement and TAN 8 encourages the use of renewable energy and requires local planning authorities to facilitate the development of all forms of renewable energy. The MIPPS states that local planning authorities should undertake an assessment of the potential of all renewable energy resource, renewable energy technologies, energy efficiency and conservation measure and include appropriate policies in LDPs.</p>  | <p>Ensure that adequate consideration and assessment is evidenced; and that the deposit plan contains appropriate policy coverage .</p>   |
| <p><b>Water and flooding</b></p> <p><b>Flooding</b> is considered to be a strategic spatial issue for Pembrokeshire (para 6.23, Issue 34). The strategy notes that some rivers are prone to flooding and that 2.2% of residential properties are in the flood plain. As a strategic</p>  | <p>Ensure that flooding is suitably addressed in the deposit plan.</p>  |

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| <p>issue, it should be highlighted in the strategy and addressed in more detail in accord with TAN 15 at the deposit plan stage and through the allocations process. An SFCA has been prepared for Haverfordwest Town Centre (provided in the background papers) but it would be useful to draw out any implications of this for the deposit LDP.</p> <p><b>Climate change adaptation</b> measures should be considered in developing the strategy, for example, it would be of value to consider what implications sea level rise could have for the coastal / estuarine settlements in Pembrokeshire (this is referenced in the Issues Paper.)</p> <p>The candidate sites assessment methodology of discarding <b>zone C</b> sites is supported. Deposit plan allocations and policies should also be in line with the TAN 15 strategy of directing development away from the floodplain. If allocations in zone C are proposed, the requirements of section 10 of TAN 15 will need to be considered.</p>                   |   |
| <p><b>Water infrastructure</b></p> <p>The strategy highlights <b>sewerage infrastructure</b> as a potentially problematic issue. National planning policy states that spatial choices should be based on, and influenced by, evidence of capacity and ability for delivery. If the provision of water/sewerage infrastructure is required, the measures needed and where, how and when they could be secured should be identified in the deposit plan. It would be useful to consider: current capacity, implications of public investment programmes, co-ordination of any improvement works, the need for phasing, and any other relevant delivery issues. Although it is unnecessary to reiterate national policy, the local implications of how infrastructure capacity and provision impact on the preferred strategy and its delivery should be clearly outlined.</p> <p>Early engagement with Dwr Cymru will provide useful information on the deliverability of development in terms of infrastructure provision.</p> | <p>Ensure that sewerage infrastructure implications for the plan's strategy and allocations are suitably addressed in the deposit plan.</p>   |
| <p><b>Retail Hierarchy</b> (8.9 &amp; page 54 &amp; <b>policy 14</b>)</p> <p>A retail hierarchy (with roles and functions) is established with Haverfordwest as a sub-regional centre. Complementary uses such as tourism are considered in conjunction with retail.</p>  | <p>The deposit plan and its evidence base should be suitably robust and clear</p>   |
| <p><b>Agricultural land</b></p> <p>There are currently no issues of consistency with the national planning policy requirement to conserve the <b>best and most versatile agricultural land</b> (PPW para 2.8.1). The Plan area does contain best and most versatile agricultural land. Whilst it is clear that the candidate site assessment methodology should highlight any problems in this respect before allocations are made (Appendix 2 A2.10), it would be beneficial if you consult us on potential strategic development sites in the run up to finalising the Deposit plan, to allow views to be expressed as early as possible.</p>   | <p>It would be beneficial if you consult us on potential strategic development sites in the run up to finalising the Deposit plan, to allow views to be expressed as early as possible.</p> |

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| <p><b>Design</b><br/>The deposit plan should clarify if there are parts of the area that need specific LPA guidance regarding what will be required in design statements (e.g. town centre), and any information on SPG (development briefs, masterplans etc).</p>   | Consider for deposit plan |
| <p><b>Welsh Language</b><br/>Para 6.19 – Objective D, para 7.20 &amp; Policy 11 - consideration has been given to the Welsh language and it features in the LDP objectives and strategic policies, taking account of PPW paragraph 2.10.2.</p>   |                           |
| <p><b>Appendix 1: Glossary of Terms</b> The explanation of “Settlement Hierarchy”, (which only relates to rural settlements) should refer to 5 levels rather than 4. It should include a reference to Narberth as a “Medium sized settlement (town)” as page 51 makes it clear that Narberth is part of the rural area.</p> <p><b>Appendix 3: Rural Facilities Survey Results</b> It is not entirely clear why Begelly is assessed as a Secondary Service Village and the Service Centre Kilgetty is referred to as “Kilgetty and Kingsmoor”. In the Settlement Hierarchy the reference is to “Kilgetty /Begelly”.</p> |                           |

| <b>CE 3 There are clear mechanisms for implementation and monitoring</b>  |   |
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| <b>Comments</b>   | <b>Suggested Actions</b>  |
| <p><b>Implementation and Delivery</b> - The <b>deliverability</b> of the preferred option has not really been addressed in the Preferred Strategy document other than reference to a broad phasing policy given the current economic downturn (para 8.6, 8.7 ). When developing the deposit plan more consideration should be given to this matter, including <b>timescales</b> for implementation, and impacts on the delivery of affordable housing should be fully explored. There is an indication that sewerage infrastructure (para 5.16 + issue 6) and other constraints are significant issues but it is not entirely clear that these have yet been fully explored; these may prejudice the delivery of the spatial growth strategy in certain areas and affect the soundness of the plan.</p> <p><b>Monitoring</b> - A <b>monitoring framework</b> is at chapter 11 which sets out targets and indicators as a basis for assessing the effectiveness of the strategic policies. Whilst this does include some useful targets and indicators, it needs to be developed further for the deposit plan to provide a better monitoring and implementation framework as this is critical in showing how the strategy will be delivered. A developed framework should consider plan objectives, strategic and relevant non-strategic policies together with principal implementation routes, responsibility for implementation (including stakeholder involvement), timescale, resource implications, targets,</p> | <p>Ensure that the key elements of the strategy can be <b>delivered</b>, and that proposed timescales this delivery are provided.</p> <p>Funding streams, key delivery agents, and infrastructure requirements will need to be identified at an early stage.</p> <p>Ensure the <b>monitoring and implementation framework</b> will be satisfactory for measuring the effectiveness of the plan strategy and policies, and that WAG core indicators are included. (+ see LDP Manual para</p> |

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| phasing and indicators. Contingencies and triggers for review should also be considered. Ensure that WAG core indicators are included. <i>(as stated at monitoring and implementation &amp; deliverability at Test CE1/2 above.)</i> | 9.5) |
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| <b>CE 4 It is reasonably flexible to enable it to deal with changing circumstances</b>   |  |
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| <b><u>Comments</u></b>   | <b><u>Suggested Actions</u></b>  |
| Some reference is provided concerning flexibility in the housing land requirements as a response to the current economic climate (see at phasing comment). The deposit LDP should be sufficiently <b>flexible</b> to enable it to deal with changing circumstances (such as a key site not coming forward for development), and identify any contingencies that might be in place, or what would trigger a review of the Plan. | Ensure that the strategy & deposit plan is sufficiently flexible to respond to changes in the economy, housing market assessment, strategic take up and other changes. |